



WACHTEL MISSRY

NEW YORK • LOS ANGELES • FLORENCE

WWW.WMLLP.COM

Jason L. Libou

212 909-9535 DIR TEL

jlibou@wmlp.com

One Dag Hammarskjold

885 SECOND AVENUE

NEW YORK NY 10017

MAIN TEL 212 909-9500

FACSIMILE 212 371-0320

April 30, 2021

Via ECF and Facsimile (212-805-7942)

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
U.S. Courthouse
500 Pearl Street, Room 1050
New York, New York 10007

*Conf is adjourned
until July 16, 2021 at
10:00 a.m.*
[Signature]
5/4/21

Re: Merlene Dayan and Estate of Raymond Dayan v. Leonora Sutton, et al.
SDNY Case No. 20-cv-9563 (AKH)

Dear Judge Hellerstein:

This law firm represents defendants Middlegate Securities Ltd., Albert Sutton, and Elias Sutton a/k/a Elliot Sutton (collectively, the "Middlegate Defendants") in the above-referenced action.

We are writing on behalf of the Middlegate Defendants and Plaintiffs to jointly request that the Court adjourn the initial conference, which is presently scheduled for May 7, 2021 at 10:00 a.m., until June 7, 2021. The reason for the adjournment request is so that the other defendants who were recently served but have not yet responded to Plaintiffs' Amended Complaint (e.g., Lenora Sutton, the Estate of Mayer Sutton, Isaac Sutton, and Morris Sutton) will have time to respond before the initial conference.

Separately, Plaintiffs and the Middlegate Defendants have agreed on a briefing schedule for the motion to dismiss filed by the Middlegate Defendants yesterday. With the Court's consent, Plaintiffs will serve their opposition papers by June 4, 2021, and the Middlegate Defendants will serve their reply papers by June 18, 2021.

We appreciate the Court's attention this matter.

Respectfully submitted,

Jason L. Libou

Jason L. Libou